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November 19, 2018

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission's Rules to Improve Wireless Coverage Through the Use of Signal Boosters*, WT Docket No. 10-4

Dear Ms. Dortch,

On November 15, 2018, Brian Benison, Celia Nogales, Alex Starr (via telephone), and the undersigned of AT&T, along with Ryan Terry of Lockheed Martin Corporation (representing the Aerospace & Flight Test Radio Coordinating Council) and James Blitz of Sirius XM, met with Kathy Harris, Amanda Huetinck (via telephone), Roger Noel, and Moslem Sawez (via telephone) of the Wireless Telecommunications Bureau regarding the above-captioned proceeding.

During the meeting, the parties discussed the Commission's tentative proposal to permit consumer signal boosters to operate in the Wireless Communications Service ("WCS") band. Specifically, the parties discussed the attached document, which shows the close proximity of WCS, satellite radio, and aeronautical mobile telemetry operations in the 2.3 GHz band. The parties explained the careful coordination process they undertake to ensure that their three distinct services are able to coexist in the band without causing interference to each other, and how the introduction of consumer signal boosters would undermine this process. The coordination process and extensive engineering limitations used in deployment of the WCS band are necessary to satisfy Commission rules adopted through a rulemaking that took years to complete because of the unique challenges encountered in deploying a new band between two existing deployments that are inherently sensitive to service disruptions due to interference.[1] Mr. Blitz also outlined the significant detrimental impact interference caused by signal boosters would have on the coordination process and ultimately on satellite radio subscribers. Finally, Mr. Terry explained the serious public safety risk posed by interference to aeronautical telemetry services and the people

[1] *See, e.g., In The Matter Of AT&T Mobility Spectrum LLC, et al., Petition For Limited Waiver Of Interim Performance Requirement For 2.3 GHz WCS C and D Block Licenses*, Order, 32 FCC Rcd 708, 709 (2017) ("As the Commission has previously explained, the 2.3 GHz Band faces unique interference challenges arising from the fact that two very different services—one chiefly satellite-based and the other terrestrial-based—are allocated to adjacent frequency bands with no guard bands separating the two").

who rely on these services. AT&T reiterated that in light of these issues, it cannot grant consent to the use of its WCS spectrum by consumer signal boosters.

Please contact the undersigned with any questions regarding this submission.

Best regards,

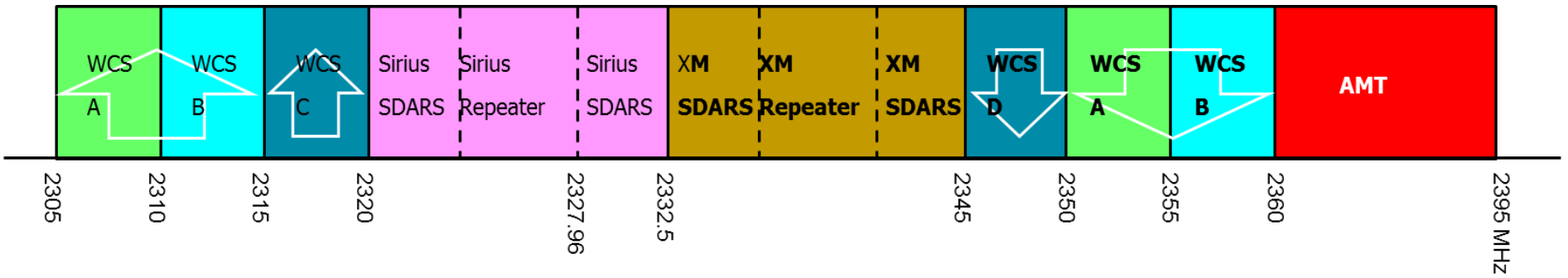
/s/ Jessica B. Lyons

Jessica B. Lyons

Attachment

Cc: Kathy Harris
Amanda Huetinck
Roger Noel
Moslem Sawez

WCS Band



- All blocks have strict limitations necessary to protect SDARS and AMT service while enabling AT&T's WCS deployments
- Extensive Coordination required given proximity to SDARS and AMT
- Boosters are enabled in many other AT&T bands that do not have the unique challenges of WCS
- The balance drawn in this band requires targeted power levels, antenna tilts, SDARS repeater deployments, line of sight considerations and other mitigation techniques that would be undone by random consumer boosters